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VIA ELECTRONIC FILING

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge
U.S. District Court for the Northern District of New York
P.O. Box 7346
Syracuse, New York 13261-7346

Re: *Brandon Williams vs. Syracuse University, et al*
Civil Action No. 5:23-cv-153 (TJM/TWD)

Dear Magistrate Judge Dancks,

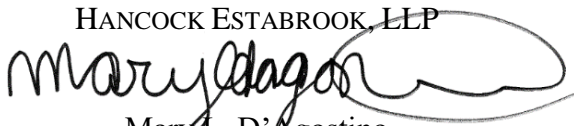
Our office represents Defendants in the above-referenced matter. On September 30, 2024, Senior District Judge Frederick J. Scullin denied Plaintiff's motion for a protective order (*see* Dkt. No. [30](#)) and determined that "that Exhibits G and H ... are judicial documents to which both a common law presumption of access and a 'qualified First Amendment right of access' apply." Dkt. No. [60](#) (quoting *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006)).

While Plaintiff's request for a protective order was pending, the Court temporarily sealed Exhibits G and H. In light of the Court's ruling, Defendants respectfully request that the Court issue an order directing the Clerk of the Court to unseal the following docket entries:

- Dkt. No. [21-10](#) (Exhibit G to the Declaration of John G. Powers); and
- Dkt. No. [21-11](#) (Exhibit H to the Declaration of John G. Powers).

In addition, because the document that was filed at Dkt. No. [21-11](#) currently contains a personal identifier (*i.e.*, Plaintiff's date of birth), I further respectfully request that the Court issue an Order directing the Clerk of the Court to replace Dkt. No. [21-11](#) with the document that is annexed hereto as **Exhibit H**, which appropriately removes the personal identifier in compliance with applicable privacy rules.

Respectfully Submitted,

HANCOCK ESTABROOK, LLP

Mary L. D'Agostino

MLD/

CC: all counsel of record (*via CM/ECF*)
Kevin M. Hutzel (*via e-mail*)